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10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA,	)	NO. 3:21-CR-00374-MMC
	)	
14 Plaintiff,	)	EXHIBITS 1 AND 2 TO AUSA FINE'S
	)	DECLARATION
15 v.	)	
	)	
16 JOSEPH HUFFAKER,	)	
	)	
17 Defendant.	)	
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# EXHIBIT 1

**UNCLASSIFIED//FOUO**  
**FEDERAL BUREAU OF INVESTIGATION**

Date of entry 05/19/2021

California Highway Patrol (CHP) Officer Robert Simas, email address [REDACTED], office telephone number (707) 489-8507, was interviewed telephonically. After being advised of the identity of the interviewing Agent and the nature of the interview, Simas provided the following information:

SA Medearis advised the purpose of the interview was determine what knowledge, if any, Simas had of a traffic stop that occurred on December 18, 2017, on U.S. Highway 101 southbound between Hopland and Cloverdale. Simas advised that he distinctly remembered a stop fitting that description and had in fact been previously interviewed at least once, and possibly twice, by investigators associated with Rohnert Park Department of Public Safety (RPDPS). SA Medearis advised that any previous interviews were separate and distinct from the FBI's investigation and admonished Simas not to discuss any of the questions asked during the previous interviews; Simas acknowledged this direction.

Simas has been an Officer with CHP for approximately 21 years.

Simas recalled the traffic stop in question that occurred on December 18, 2017. Simas had a trainee with him at the time, CHP Officer Baker. Simas believed Baker was driving at the time. As they drove southbound on U.S. Highway 101, Simas and Baker observed an unmarked black Ford Explorer with its lights activated. Simas observed the Explorer had pulled over a mid-size SUV, light, possibly gray, in color.

Simas had seen the unmarked black Ford Explorer in various pullouts along U.S. Highway 101 in the previous three to six months. Simas did not know what agency the Explorer was associated with but had speculated it may have a fish and wildlife vehicles as Simas was aware they occasionally did undercover enforcement work.

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Investigation on 05/18/2021 at Concord, California, United States (Phone)File # 194C-SF-2943205Date drafted 05/19/2021by Scott W. Medearis

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194C-SF-2943205

Continuation of FD-302 of (U//FOUO) Interview of Robert Simas , On 05/18/2021 , Page 2 of 3

Simas and Baker pulled over and parked behind the Explorer.

[REDACTED]

to pull over and ensure the officers were code four and did not need any assistance. Such stops are commonly referred to as "assists."

Simas and Baker exited their vehicle and approached the black Explorer. They observed one officer engaged with one subject, presumably the driver the of the SUV. A second officer walked back toward Simas and Baker. Simas immediately recognized this second officer as Jacy Tatum. Simas spent several years as the CHP representative on a California Department of Justice narcotics task force. Toward the end of his time in this role, Simas met Tatum while Tatum was working on a Sonoma County narcotics task force.

Baker also knew Tatum. Prior to joining CHP, Baker was a contractor and had performed some sort of construction work for Tatum. Simas described this relationship as purely coincidental.

Simas did not recognize the second RPDPS officer and could not recall his name. When Tatum walked back to the Black Explorer to meet Simas, Tatum left the second officer alone with the subject. Based on this fact, Simas got the impression that the second officer was not a rookie and had some level of experience, otherwise Tatum would not have left him alone.

The RPDPS officers wore civilian clothes and tactical vests. Simas did not see any markings identifying their agency, but did recall seeing patches that read "POLICE."

When Simas realized it was Tatum and RPDPS at the stop, he was curious what RPDPS was doing so far over the county line. Because there were not safe places to conduct traffic stops or u-turns near the county line, it was not uncommon for law enforcement agencies on both sides of the county line to cross into the other county to complete traffic stops or simply to turn around. However, Simas figured the current location was approximately six miles over the county line, which seemed quite far. Simas asked Tatum what Tatum was doing that far north and Tatum answered that he was working pursuant to some sort of federal grant.

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Continuation of FD-302 of (U//FOUO) Interview of Robert Simas , On 05/18/2021 , Page 3 of 3

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Simas does not typically write a report for an "assist" type stop. However, he would generally note such assists in the daily log. In this case however, he did not believe the assists was recorded in the daily log simply because his trainee forgot to do so.

Neither Simas nor Baker contacted the subject of RPDPS's stop. In fact Simas did not physically pass the black Explorer as he approached the scene. RPDPS's stop was ongoing when Simas and Baker left the scene. Simas never learned any of the details of the stop, such as the subjects name or the outcome of the stop.

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# EXHIBIT 2



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FEDERAL BUREAU OF INVESTIGATION

Date of entry 05/26/2021

On May 21, 2021, California Highway Patrol (CHP) Officer Robert Simas was interviewed telephonically regarding his identification of Joseph Huffaker as documented in the referenced serial. Simas provided the following information:

Simas saw a picture of Joseph Huffaker in a news article. Simas could not recall the details of the article, but remembered the article dealt with Tatum and Huffaker's interdiction stops and mentioned the fact that both had been fired from the Rohnert Park Department of Public Safety. Simas saw the article approximately within the month prior to this interview.

Simas was confident that the second officer at the stop was the individual he identified in the photograph. He reiterated his recollection that although the individual he identified as being the second officer at the December 18, 2017, stop had facial hair in the photograph, the individual was clean shaven at the time of the traffic stop.

Simas did not recall previously being asked to identify the second officer. Simas did recall being shown photographs during a prior interview with non-FBI investigators but the photos were not of police officers and were not shown in an attempt to identify the second officer. *[Note: SA Medearis did not ask, and Simas did not divulge the questions he was asked in his prior interview(s).]*

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